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June 13, 2025

VIA ECF

Honorable Justin T. Quinn
United States Magistrate Judge
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: *Edwin H. Stier, Esq. as Wind Down Trustee for MLS Berkowitz Investments, LLC v. Diego Possebon, et al.*, No. 3:24-cv-04647-RK-JTQ

Dear Judge Quinn:

This firm is co-counsel for Plaintiff, Edwin H. Stier, Esq. as Wind Down Trustee for MLS Berkowitz Investments, LLC (“Plaintiff” or the “Trustee”). We write in response to Your Honor’s Text Order directing Plaintiff to file a letter “identifying the current status of each Defendant” and, more specifically, “which Defendants: (1) have been dismissed; (2) have answered; (3) are in default; (4) have filed motions (and include the type of motion and whether it is fully briefed); and (5) have not yet answered and are not currently in default (if any).” *See* (ECF No. 397) (the “Text Order”). The Text Order also instructs Plaintiff to direct the Court’s attention to any pending discovery disputes, and “catalog the Defendants that have filed counterclaims, cross-claims, and third-party claims and state whether those claims have been responded to.” *See (id.)*.

Consistent with the Text Order, and for the Court’s ease of reference, the Trustee has included a chart below identifying the status of each defendant named in the Trustee’s Complaint. *See* (ECF Nos. 1 and 7). In addition, we have included an overview of pending motions and issues that are ripe for resolution by the Court.

I. Motions and Other Issues Ripe for Resolution by the Court

As detailed in the Complaint, this case arises from a massive fraud perpetrated against MLS Berkowitz, LLC (“MLS”), a New Jersey company trading raw metals, and its principal creditor, Gerald Metals SARL (“Gerald”). MLS and Gerald were victimized by a sophisticated conspiracy involving over 100 individuals and entities, resulting in the loss of nearly \$50 million. *See* Complaint, ¶¶ 1-9. Consistent with the massive scale of the fraud perpetrated against MLS and the scores of people and entities who have received proceeds from that fraud, the Complaint names upwards of 200 defendants, the vast majority of which are located overseas.

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A. The Pending Consent Order Seeking Permission for Defendant Fidelity to Deposit \$3.7 Million with the Clerk of the Court

As is relevant here, the Complaint alleges that: (a) the fraud against MLS was masterminded by defendant Diego Possebon (“Possebon”), who lives in Brazil with his wife, defendant Larissa Carvalho Possebon (“L. Possebon”); and (b) a substantial portion of the proceeds from the fraud were used by L. Possebon to purchase a pre-construction luxury beach condominium in Miami, Florida. *See id.*, ¶¶ 1-8, 18, 47, 352-63. Defendant Miami Waterfront Ventures, LLC (“Miami Waterfront”) is the developer of the condominium purchased by L. Possebon. *See id.*, ¶ 352. Defendant Fidelity National Title Insurance Co. (“Fidelity”), the escrow agent for the transaction, is currently holding \$3,337,500 in escrowed funds (the “Fidelity Funds”) in connection with L. Possebon’s contract to purchase the condominium. *See id.*, ¶¶ 352-63. Fidelity also released \$912,500 to Miami Waterfront related to the construction of L. Possebon’s condominium. *See id.*, ¶ 361. Defendant Monique Levy (“Levy”), who is Possebon’s sister and L. Possebon’s sister-in-law, is the real estate sales associate who represented L. Possebon in connection with the condominium purchase. *See id.*, ¶ 355. Defendant Empire Strong International Business Intermediation One LLC wired approximately \$4 million to Levy and Fidelity for deposit payments for L. Possebon’s condominium. *See id.*, ¶¶ 357-63. Levy submitted a declaration in the bankruptcy action from which this case arises in which she admitted to disbursing, at Possebon’s direction, funds in connection with L. Possebon’s Miami condominium purchase that had been wired to her by Defendant Empire Strong International Business Intermediation One LLC.¹

On June 7, 2024, the Trustee moved to serve the Complaint on L. Possebon by alternative means. *See* (ECF No. 88) (the “Alternative Service Motion”). In his supporting brief, the Trustee submitted that the Court should permit alternative service because (a) serving L. Possebon pursuant to the Hague Convention² could take six months or longer, and (b) the Trustee intended to move for summary judgment on an expedited basis to recover the Fidelity Funds. *See* (ECF No. 88-1 at 2). On August 9, 2024, United States counsel retained by L. Possebon filed an opposition to the Alternative Service Motion. *See* (ECF No. 162). On August 16, 2024, the Trustee filed a reply brief in further support of the Alternative Service Motion. *See* (ECF No. 176). On October 30, 2024, a second United States law firm engaged by L. Possebon moved for permission to file a sur-reply in opposition to the Alternative Service Motion, *see* (ECF No. 264), and the Trustee filed a response on November 18, 2024, *see* (ECF No. 292). On January 27, 2025, Magistrate Judge Singh issued a Memorandum Opinion and Order denying the Alternative Service Motion without prejudice and granting L. Possebon’s motion to file a sur-reply. *See* (ECF No. 341).

Meanwhile, on June 17, 2024, Fidelity filed a counterclaim against the Trustee and cross-claim against Levy, Miami Waterfront, L. Possebon, and Empire Strong International Business Intermediation One LLC for interpleader pursuant to 28 U.S.C. § 1335. *See* (ECF No. 103). On the same day, Fidelity filed an order to show cause in which it requested relief including permission

¹ A copy of Levy’s October 16, 2023 Declaration is attached hereto as Exhibit A.

² The Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil and Commercial Matters, Nov. 15, 1965, 20 U.S.T. 361, 658 U.N.T.S. 163 (the “Hague Convention”).

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to deposit the Fidelity Funds with the Clerk of the Court. *See* (ECF No. 104) (the “Fidelity OTSC”). On August 13, 2024, Fidelity submitted a proposed consent order, agreed to by the Trustee, Monique Levy, and Miami Waterfront, pursuant to which the Fidelity OTSC would be resolved by Fidelity depositing the Fidelity Funds with the Clerk of the Court, and also providing that the Trustee would dismiss his claims against Fidelity without prejudice. *See* (ECF No. 168) (the “Proposed Fidelity Consent Order”).

The Trustee and Miami Waterfront subsequently reached an agreement to resolve the Trustee’s claims against Miami Waterfront under which Miami Waterfront will return the funds it received in connection with the condominium purchase by L. Possebon, and the Court “so ordered” a stipulation between the Trustee and Miami Waterfront providing that: (i) all litigation between the Trustee and Miami Waterfront would be stayed pending the resolution of the Fidelity OTSC or the entry of the Proposed Fidelity Consent Order, whichever occurred first; and (ii) the Trustee would voluntarily dismiss his claims against Miami Waterfront within five days of the first to occur of the resolution of the Fidelity OTSC or entry of the Proposed Fidelity Consent Order. *See* (ECF No. 300).

On January 23, 2025, Magistrate Judge Singh ordered the administrative termination of the Fidelity OTSC in light of the Alternative Service Motion, which was still pending, and the Proposed Fidelity Consent Order. To date, the Court has not entered the Proposed Fidelity Consent Order.

B. The Trustee’s Pending Motion to Refer His Claims Against Certain Defendants to the Bankruptcy Court

As explained in prior submissions to the Court, *see, e.g.*, (ECF No. 367), the Trustee has since streamlined this action by voluntarily dismissing many of the foreign defendants. The Trustee has also sought to streamline and narrow the litigation as presently structured before this Court by moving to have the Trustee’s claims against certain defendants referred to the Bankruptcy Court. *See* (ECF No. 365) (the “Motion to Refer”). While the Trustee did not seek to refer his claims against defendant Defendant Adukargo Transportes E Logistica E Servios de Armazenagens, Ltd. (“Adukargo”) to the Bankruptcy Court, Adukargo has opposed the Motion to Refer. *See* (ECF No. 377). And Adukargo’s opposition was joined by Defendant Braga Exports, Inc. (“Braga”). *See* (ECF No. 381). In response to the Motion to Refer, defendant Reag USA LLC (“Reag”), cross-moved to dismiss pursuant to F.R.C.P. 12(b)(1) and 12(b)(6). *See* (ECF Nos. 380 and 382).

Fidelity filed a response to the Motion to Refer: (a) stating that Fidelity did not oppose the Motion to Refer; and (b) requesting that, if the Court is inclined to grant the relief requested by the Trustee, the Court also refer Fidelity’s counterclaim against the Trustee, and cross-claim against Levy, Empire Strong International Business Intermediation One LLC, Miami Waterfront, and L. Possebon (“L. Possebon”), for interpleader to the Bankruptcy Court. *See* (ECF No. 379). The Trustee filed reply papers addressing Adukargo’s opposition, *see* (ECF No. 386), and opposing Reag’s motion to dismiss, *see* (ECF No. 387). The Motion to Refer was fully briefed as of April 14, 2025, and the return date was April 21, 2025.

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C. Pending Requests for Pre-Motion Conferences in Anticipation of Motions to Dismiss Pursuant to F.R.C.P. 12(b).

Of the defendants not included in the Motion to Refer, Adukargo, *see* (ECF No. 280), and Opus Assessoria e Promocoes Artisticas Ltda. d/b/a Opus Entretenimento (“Opus”), *see* (ECF No. 239), filed letters with the Court pursuant to Judge Castner’s individual preferences requesting conferences concerning anticipated motions to dismiss. The Trustee filed letters responding to the arguments made by Adukargo, *see* (ECF No. 289), and Opus, *see* (ECF No. 248).

Of the defendants included in the Motion to Refer, the following have filed letters with the Court,³ to which the Trustee has responded, requesting conferences concerning anticipated motions to dismiss:

- Alexandre Schutz Ribas, A.S.R. Assessoria Empresarial Ltda., and Schutz Assessoria Empresarial Ltd. *See* (ECF No. 301) (motion) and (ECF No. 308) (Trustee response).
- Astronauta Enterprise, Inc. *See* (ECF No. 266) (pre-motion letter) and (ECF No. 276) (Trustee response).
- Beach House & Condominium. *See* (ECF No. 314) (pre-motion letter) and (ECF No. 326) (Trustee response).
- Coinbase, Inc. *See* (ECF No. 206) (motion) and (ECF No. 231) (Trustee response).
- Quick Autoproviders Inc. *See* (ECF No. 235) (pre-motion letter) and (ECF No. 246) (Trustee response).
- Reag. *See* (ECF No. 155) (pre-motion letter) and (ECF No. 326) (Trustee response); and (ECF Nos. 380 and 382) (motion to dismiss papers) and (ECF No. 387) (Trustee response).

The Court has not yet held any pre-motion conferences to address the above submissions.

D. Pending Counterclaims and Crossclaims

As noted above, Fidelity, on June 17, 2024, filed a counterclaim against the Trustee and crossclaims against Levy, Empire Strong International Business Intermediation One LLC, Miami Waterfront, and L. Possebon for interpleader. *See* (ECF No. 103). On July 22, 2024, the Trustee filed an answer to Fidelity’s counterclaim. *See* (ECF No. 140). Through the Proposed Fidelity Consent Order, the Trustee, Levy, and Miami Waterfront have indicated their consent to Fidelity’s request to interplead the Fidelity Funds with the Court. Fidelity has moved for a default judgment against defendant Empire Strong International Business Intermediation One LLC on the interpleader crossclaim. *See* (ECF Nos. 389 and 393). The return date for Fidelity’s motion for a default judgment was May 19, 2025, and, to date, Empire Strong International Business Intermediation One LLC has not filed any opposition.

On August 21, 2024, defendant Braga Exports, Inc. (“Braga”) filed crossclaims for indemnification and contribution against Empire Strong International Business Intermediation Once LLC, Empire Strong Negocios Ltda., and Wave Tech Co. *See* (ECF No. 168). The Trustee’s

³ As explained in the table below, certain defendants filed motions to dismiss which the Court construed as requests for pre-motion conferences.

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review of the docket indicates that none of the defendants named in Braga's crossclaims have filed responsive pleadings, and that Braga has not sought to enter a default against any of these defendants.

E. The Current Status of Discovery

Finally, the Trustee has not yet engaged in any formal discovery given that the Court has not yet issued a scheduling order or held a preliminary conference pursuant to F.R.C.P. 16.

II. Status of Each Defendant Named in the Complaint

Defendant	Country	Current Status
1st SPORTS CORP.	Taiwan	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
ADUKARGO TRANSPORTES E LOGISTICA E SERVICOS DE ARMAZENAGENS LTDA.	Brazil	On November 11, 2024, defendant filed a letter requesting a pre-motion conference concerning a Rule 12(b) motion to dismiss pursuant to Judge Castner's judicial preferences. <i>See</i> (ECF No. 280). On November 18, 2024, the Trustee filed a letter in response. <i>See</i> (ECF No. 289).
ADRIANO DA SILVA AMORIM	Brazil	The Trustee's agents in Brazil are engaged in ongoing investigative efforts to locate this defendant to facilitate service of process by the Brazilian Central Authority.
AIR PLUS POWER CORPORATION	Taiwan	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
ALBEMO TRADING AND FINANCE UK LTD.	UK	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on March 7, 2025. <i>See</i> (ECF No. 360). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
ALEXANDRE SCHUTZ RIBAS	Brazil	This defendant filed a Rule 12(b) motion to dismiss on December 2, 2024. <i>See</i> (ECF No. 301). On December 3, 2024, the Court construed defendant's motion to dismiss as a request for a pre-motion conference pursuant to Judge Castner's judicial preferences and directed the Trustee to file a letter in response. <i>See</i>

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		(ECF No. 302). On December 10, 2024, the Trustee filed a letter response. <i>See</i> (ECF No. 308). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
ALTAVISTA ROMÃO SOCIEDADE INDIVIDUAL DE ADVOCACIA F/K/A SCHUNCK ADVOGADOS	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on September 10, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority without objection, and counsel is waiting for the Brazilian courts to complete service.
AMERICA THAI JOYAS CO. LTD.	Thailand	The Trustee's agent has attempted service on defendant pursuant to F.R.C.P. 4(f)(2)(A) and is awaiting confirmation as to whether the service was successful. <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
ANHUI SHENGJIDUNG AUTO PARTS CO.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
ANTONIO CARLOS FLORES MENDES	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority without objection, and counsel is waiting for the Brazilian courts to issue the document to confirm completion of service.
A.P.N. SERVICOS LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel,

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		defendant is challenging service of the Trustee's complaint in the Brazilian courts.
A.R.M. DANTAS LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). The Trustee's Brazilian counsel is waiting for the federal court in Brazil to complete service of process on defendant.
ARLEN SOOKIAS	USA	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 230).
ARTS GESTORA E ADMINISTRADORA	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
ASIA YARN GROUP LIMITED	Hong Kong	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 396).
ASTRONAUTO ENTERPRISE INC.	USA	On October 30, 2024, defendant filed a letter requesting a pre-motion conference concerning a Rule 12(b) motion to dismiss pursuant to Judge Castner's judicial preferences. <i>See</i> (ECF No. 266). On November 6, 2024, the Trustee filed a letter in response. <i>See</i> (ECF No. 276). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
A.S.R. ASSESSORIA EMPRESARIAL LTDA.	Brazil	This defendant filed a Rule 12(b) motion to dismiss on December 2, 2024. <i>See</i> (ECF No. 301). On December 3, 2024, the Court construed defendant's motion to dismiss as a request for a pre-motion conference pursuant to Judge Castner's judicial preferences and directed the Trustee to file a letter in response. <i>See</i> (ECF No. 302). On December 10, 2024, the Trustee filed a letter response. <i>See</i> (ECF No. 308). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>

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AYALLA MIGUEL DE CARVALHO	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
BANCO BRADESCO S.A.	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
BANCO BTG PACTUAL S.A.	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
BANCO MASTER S.A.	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
BANCO RENDIMENTO S.A.	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
BANCO SAFRA S.A.	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
BEACH HOUSE & CONDOMINIUM	USA	<p>On December 12, 2024, defendant filed a letter requesting a pre-motion conference concerning a Rule 12(b) motion to dismiss pursuant to Judge Castner's judicial preferences. <i>See</i> (ECF No. 314). On December 19, 2024, the Trustee filed a letter in response. <i>See</i> (ECF No. 326).</p> <p><i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i></p>
BELOVIX COMERCIO IMPORTACAO E EXPORTACAO LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, the Brazil Central Authority has not yet been able to locate this defendant to notify it about the pending letter rogatory.
BETTER SILVER S.P.A.	Italy	Defendant has been served with process, <i>see</i> (ECF No. 358), and must respond to the complaint on or before June 16, 2025, <i>see</i> (ECF No. 391).
BRAGA EXPORTS INC.	USA	On August 13, 2024, defendant filed an answer to the complaint, along with affirmative defenses and crossclaims for indemnification and contribution against defendants Empire Strong International

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		Business Intermediation One LLC, Empire Strong International Business Intermediation LLC, Empire Strong Negocios Ltda., and Wave Tech Co. <i>See</i> (ECF 168). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
BRAZ CENTER SERVICES INC.	USA	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on December 17, 2024. <i>See</i> (ECF No. 318). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
BRAZJET EXPRESS INC.	USA	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on December 17, 2024. <i>See</i> (ECF No. 319). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
BRIGHT CELCOM WHOLESALE LLC	USA	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on May 21, 2024. <i>See</i> (ECF No. 58).
BR MULTISERVICOS LTDA.	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
BUBBLEGUM SHOES, INC.	USA	Default judgment obtained pursuant to F.R.C.P. 55(b)(1). <i>See</i> (ECF No. 313).
C. COSTA DOS SANTOS LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on May 17, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, although the Brazil Central Authority has been unable to locate this defendant to notify it about the pending letter rogatory, the Federal Public Defender in Brazil has agreed that service should be executed on this defendant.
C.D.I.SPA	Italy	The Trustee's agent recently served this defendant pursuant to F.R.C.P.

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		4(f)(2)(A), and the Trustee will file an affidavit of service to that effect with the Court. <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
CELAVI INVESTIMENTOS E PARTICIPACOES LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant is challenging service of the Trustee's complaint in the Brazilian courts.
CESALON – CENTRO DE SERVICOS EM ACOS LONGOS LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority, and counsel is waiting for the Brazilian courts to issue the document to confirm completion of service.
CHAN SHUN MING	Hong Kong	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
CHANG YUK KING	Hong Kong	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
CHANGZHOU NANTAI GAS SPRING CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
CHI LONG ELECTRONIC CO. LIMITED	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
CHINA BASE NINGBO FOREIGN TRADE	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
CHRISTIAN COSTA DOS SANTOS	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel,

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		defendant has received a copy of the letter rogatory from the Central Authority without objection, and counsel is waiting for the Brazilian courts to complete service.
CLOVIS S. AMORIM	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
COINBASE INC.	USA	<p>This defendant filed a Rule 12(b) motion to dismiss on September 6, 2024. <i>See</i> (ECF No. 206). On September 18, 2024, the Court construed defendant's motion to dismiss as a request for a pre-motion conference pursuant to Judge Castner's judicial preferences and directed the Trustee to file a letter in response. <i>See</i> (ECF No. 228). On September 23, 2024, the Trustee filed a letter response. <i>See</i> (ECF No. 231).</p> <p><i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i></p>
CONTINENTAL ADVANTAGE SERVICES, INC.	USA	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 299).
CORSAIR MEMORY INC.	USA	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 148).
DAKAR INDUSTRIA DE COMPONENTES INDUSTRIAIS LTDA	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority, and counsel is waiting for the Brazilian courts to issue the document to confirm completion of service.
DANIEL POSSEBON BARGAS	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority

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		without objection, and counsel is waiting for the Brazilian courts to issue the document to confirm completion of service.
DENVER SPA	San Marino	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
DIEGO POSSEBON	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on May 17, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant is challenging service of the Trustee's complaint in the Brazilian courts.
DIEGO POSSEBON – ME	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant is challenging service of the Trustee's complaint in the Brazilian courts.
DK ASSESSORIA E INTERMEDIACAO DE NEGOCIOS LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority without objection, and counsel is waiting for the Brazilian courts to complete service.
DREAM WATCH BR LLC	USA	Default judgment obtained pursuant to F.R.C.P. 55(b)(1). <i>See</i> (ECF No. 315).
EAGLE MAN COMERCIO DE ARTIGOS DE VESTUARIO LTDA.	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
EDINEIA PIABA ARAUJO LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, although the Brazil Central Authority has been unable to locate this defendant to notify it

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		about the pending letter rogatory, the Federal Public Defender in Brazil has agreed that service should be executed on this defendant.
EGR CONCEPTS INC.	USA	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 82).
ELEGANT SILVER JEWELLERY	India	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
ELITE ELECTRIC APPLIANCE MANUFACTURE	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
ELVIS HENRIQUE F. SILVA	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
EMPIRE STRONG INTERNATIONAL BUSINESS INTERMEDIATION ONE, LLC	USA	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on May 21, 2024. <i>See</i> (ECF No. 61). On June 3, 2025, the Trustee filed a motion for default judgment against this defendant pursuant to F.R.C.P. 55(b)(2). <i>See</i> (ECF No. 398).
EMPIRE STRONG INTERNATIONAL BUSINESS INTERMEDIATION, LLC A/K/A STRONG EMPIRE INTERNATIONAL BUSINESS INTERMEDIATION, LLC	USA	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on May 21, 2024. <i>See</i> (ECF No. 62). On June 3, 2025, the Trustee filed a motion for default judgment against this defendant pursuant to F.R.C.P. 55(b)(2). <i>See</i> (ECF No. 398).
EMPIRE STRONG NEGOCIOS LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant is challenging service of the Trustee's complaint in the Brazilian courts.
ERIK KAPLAN	USA	On November 7, 2024, this defendant filed an answer to the complaint and affirmative defenses. <i>See</i> (ECF No. 277). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>

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EXPOBRAZ EXPORT IMPORT E AGROPECUARIA LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority, and counsel is waiting for the Brazilian courts to issue the document to confirm completion of service.
EXPOBRAZ USA LLC	USA	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on May 21, 2024. <i>See</i> (ECF No. 63).
F&B AUTOPECAS E ACESSORIOS PARA	USA	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 359).
FERNANDA ALVES DE SOUZA	USA/Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on September 4, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, although the Brazil Central Authority has been unable to locate this defendant to notify her about the pending letter rogatory, the Federal Public Defender in Brazil has agreed that service should be executed on this defendant.
FFORWARD LLC	USA	Default judgment obtained pursuant to F.R.C.P. 55(b)(1). <i>See</i> (ECF No. 312).
FIDELITY NATIONAL TITLE INSURANCE CO.	USA	On June 17, 2024, this defendant filed an answer to the complaint and affirmative defenses and a counterclaim/crossclaim for interpleader against the Trustee and defendants Monique Levy, Miami Waterfront Ventures, LLC, Empire Strong International Business Intermediation One LLC, and Larissa Carvalho Possebon. <i>See</i> (ECF No. 103). On July 22, 2024, the Trustee filed an answer to the counterclaim. <i>See</i> (ECF No. 140). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
FOSHAN BESTHOUSE CERAMICS	China	Voluntarily dismissed pursuant to

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CO. LTD.		F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
FOSHAN WINNER FURNITURE CO. LTD.	Singapore	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
FRANCINE POSSEBON	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant is challenging service of the Trustee's complaint in the Brazilian courts.
FRANCISCO BONATES	Brazil	The Trustee's agents in Brazil are engaged in ongoing investigative efforts to locate this defendant to facilitate service of process by the Brazilian Central Authority.
GABRIEL MARIA D. CENTENO	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
GETWELL TRADING LIMITED	Hong Kong	The Trustee's agent recently served this defendant pursuant to F.R.C.P. 4(f)(2)(A), and the Trustee will file an affidavit of service to that effect with the Court. <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
GIL KAPLAN	USA	On November 7, 2024, this defendant filed an answer to the complaint and affirmative defenses. <i>See</i> (ECF No. 277). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
GLOBAL EMPIRE LTD.	Bahamas	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on March 7, 2025. <i>See</i> (ECF No. 362).
GLOBAL EMPIRE HOLDING LTD.	Bahamas	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on March 7, 2025. <i>See</i> (ECF No. 361).

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GLOBAL SOLUCOES INTEGRADAS LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority without objection, and counsel is waiting for the Brazilian courts to complete service.
GUILHERME RAMAO	Brazil	The Trustee's agents in Brazil are engaged in ongoing investigative efforts to locate this defendant to facilitate service of process by the Brazilian Central Authority.
HAINING MINGSHUAI TECHNOLOGY	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
HEBEI JIUYE COOKWARE CO., LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
HEFEI DAYU FITNESS	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
HENGSHUI GUANGXING SCREENS CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
HITS ENTERTAINMENT INTERNATIONAL LLC;	USA	The Florida Secretary of State accepted substitute service of process for defendant on May 29, 2024. <i>See</i> (ECF Nos. 121 and 125). Defendant did not file an answer to the complaint by the deadline of June 20, 2024. <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
HITS ENTRETENIMENTO, LTDA	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on August 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, the Brazil Central Authority has not yet been able to locate this defendant to notify it about the pending letter rogatory.

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HK NAGA IMPORT & EXPORT LIMITED	Hong Kong	<p>The Trustee's agent recently served this defendant pursuant to F.R.C.P. 4(f)(2)(A), and the Trustee will file an affidavit of service to that effect with the Court.</p> <p><i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i></p>
HUI SHENG SILVER JEWELRY CO. LTD.	Hong Kong	<p>The Trustee's agent unsuccessfully attempted service on defendant pursuant to F.R.C.P. 4(f)(2)(A) and has been otherwise unable to effectuate service.</p> <p><i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i></p>
IARA GALDINO DA SILVA	Brazil	<p>The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on August 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority without objection, and counsel is waiting for the Brazilian courts to complete service.</p>
INNOVISION MULTIMEDIA LIMITED	Hong Kong	<p>The Trustee's agent is attempting service on defendant pursuant to F.R.C.P. 4(f)(2)(A).</p> <p><i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i></p>
INTCO	Hong Kong	<p>Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).</p>
ITAU UNIBANCO S.A.	Brazil	<p>Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).</p>
J. CESAR JACOBSEN	Brazil	<p>This defendant was served with process on April 9, 2025, and is in default. <i>See</i> (ECF No. 392).</p>

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JACQUELINE FERREIRA SIQUEIRA	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
JEAN DAVIDSON ARAUJO	USA	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on May 21, 2024. <i>See</i> (ECF No. 66). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
JEANNE RODRIGUES	USA	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 225).
JIAXING EPONT IMPORT & EXPORT CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
JINAN JINBAO	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
JOSE HENRIQUE MAIA GIACOMOLLI LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant is challenging service of the Trustee's complaint in the Brazilian courts.
JOUBERT DONINELI KONRATH	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). The Trustee's Brazilian counsel is waiting for the federal court in Brazil to complete service of process on defendant.
JULIO CESAR JACOBSEN	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority without objection, and counsel is waiting for the Brazilian courts to issue the document to confirm completion of

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		service.
K13 SISTEM DANISMANLIK LTD. STI	Turkey	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
KOEHLER INSTRUMENT	USA	This defendant filed an answer to the complaint on June 14, 2024. <i>See</i> (ECF No. 99). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
KILOMAX INTERNATIONAL LIMITED	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
L&D FLORIDA INVESTMENTS CORP.	USA	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 78).
LAKOCRED CONSULTORIA E SOLUCOES LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority. According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority without objection, and counsel is waiting for the Brazilian courts to issue the document to confirm completion of service.
LARISSA CARVALHO POSSEBON	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 5, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant is challenging service of the Trustee's complaint in the Brazilian courts. The Court previously denied the Trustee's motion to serve this defendant with the summons and complaint by alternative means. <i>See</i> (ECF No. 341).
LIDIANE LEITE MELO	Brazil	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on March 7, 2025. <i>See</i> (ECF No. 363).
LIGO PRODUCT LIMITED	Hong Kong	The Trustee's agent recently served this defendant pursuant to F.R.C.P. 4(f)(2)(A), and the Trustee will file an affidavit of service to that effect with the

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		Court. <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
LINGLONG TYRE CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). See (ECF No. 368).
LORD KRISHNA OVERSEAS	India	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). See (ECF No. 368).
LUCAS GIACOMOLLI	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on August 8, 2024. See (ECF No. 218). According to the Trustee's Brazilian counsel, defendant is challenging service of the Trustee's complaint in the Brazilian courts.
LUCKY GLOBAL IMPORT AND EXPORT CO. LTD.	Thailand	The Trustee's agent has attempted service on defendant pursuant to F.R.C.P. 4(f)(2)(A) and is awaiting confirmation as to whether the service was successful. <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
M. DUARTE DE SOUZA, LTDA., A/K/A MDS TRADE SOLUTIONS	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on September 10, 2024. See (ECF No. 218). According to the Trustee's Brazilian counsel, the Brazil Central Authority has not yet been able to locate this defendant to notify it about the pending letter rogatory.
M.B. ALMEIDA	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. See (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority without objection, and counsel is waiting

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		for the federal court in Brazil to complete service of process on defendant.
MACK SCIENCE INC.	USA	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 149).
MAERLON DUARTE DE SOUZA	Brazil	The Trustee's agents in Brazil are engaged in ongoing investigative efforts to locate this defendant to facilitate service of process by the Brazilian Central Authority.
MARCELO DE MESQUITA DUARTE	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant is challenging service of the Trustee's complaint in the Brazilian courts.
MATHEUS DUTRA SILVA	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on August 8, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority, and counsel is waiting for the federal court in Brazil to complete service of process on defendant.
MATHEUS POSSEBON	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on May 17, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant is challenging service of the Trustee's complaint in the Brazilian courts.
METALSUR INDUSTRIA E COMERCIO DE ACOS LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on May 17, 2024. <i>See</i> (ECF No. 218). Defendant was served with process pursuant to the Hague Convention on May 14, 2025. <i>See</i> (ECF No. 399). Defendant did not file an answer to the complaint by the deadline of June 4, 2025.

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MIAMI WATERFRONT VENTURES LLC	USA	Miami Waterfront was served with the summons and complaint on June 5, 2024. <i>See</i> (ECF No. 91). Miami Waterfront has not answered or filed a letter requesting a conference in anticipation of a motion to dismiss. However, the Trustee and Miami Waterfront have reached a resolution to resolve the Trustee's claims against Miami Waterfront, and, on November 22, 2024, the Court "so ordered" a stipulation between the Trustee and Miami Waterfront under which: (i) all litigation between the Trustee and Miami Waterfront would be stayed pending the resolution of the Fidelity OTSC or the entry of the Proposed Fidelity Consent Order, whichever occurred first; and (ii) the Trustee would voluntarily dismiss his claims against Miami Waterfront within five days of the first to occur of the resolution of the Fidelity OTSC or entry of the Proposed Fidelity Consent Order. <i>See</i> (ECF No. 300).
MICHAEL PANZERI	DUBAI	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
MIX ENTERPRISES LLC	USA	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on May 21, 2024. <i>See</i> (ECF No. 75). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
MOMENT KIWYQA ERP KUYUMCULUK DIS	Turkey	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
MONIQUE LEVY	USA	This defendant filed an answer to the complaint on October 10, 2024. <i>See</i> (ECF No. 249).
MORNING GLORY EVERGREEN CO. LTD.	Thailand	The Trustee's agent has attempted service on defendant pursuant to F.R.C.P. 4(f)(2)(A) and is awaiting confirmation as to whether the service was successful. <i>*This defendant is included in the</i>

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		<i>Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
MP CAPITAL AND INVESTMENTS LLC	USA	<p>The Florida Secretary of State accepted substitute service of process for defendant on May 29, 2024. <i>See</i> (ECF Nos. 122 and 125). Defendant did not file an answer to the complaint by the deadline of June 20, 2024.</p> <p><i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i></p>
NANZO HOLDINGS, INC.	USA	<p>On November 7, 2024, this defendant filed an answer to the complaint and affirmative defenses. <i>See</i> (ECF No. 277).</p> <p><i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i></p>
NANZO LLC	USA	<p>On November 7, 2024, this defendant filed an answer to the complaint and affirmative defenses. <i>See</i> (ECF No. 277).</p> <p><i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i></p>
NEW SEGURA ADMINISTRACAO DE IMOVEIS LTDA. D/B/A T&F CONSULTORIA E GESTAO DE IMOVEIS	Brazil	<p>The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority, and counsel is waiting for the Brazilian courts to issue the document to confirm completion of service.</p>
NICE MATCH INTERNATIONAL CO., LTD.	Taiwan	<p>Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).</p>
NILO COUNTRY EMPREENDIMENTOS IMOBILIARIOS SPA LTDA.	Brazil	<p>The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on August 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel,</p>

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		defendant is challenging service of the Trustee's complaint in the Brazilian courts. <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
NINGBO DINGJIA AUTO PARTS	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
NINGBO FREE TRADE ZONE YOUNGCOM INT.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
NINGBO GENERAL UNION CO., LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
NINGBO JIN MAO IMPORT AND EXPORT CO.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
NINGBO JUMSON INTERNATIONAL TRADE	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
NINGBO TOPWIN CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
OPUS ASSESSORIA E PROMOCOESARTISTICAS LTDA. D/B/A OPUS ENTRETENIMENTO	Brazil	On September 30, 2024, defendant filed a letter requesting a pre-motion conference concerning a Rule 12(b) motion to dismiss pursuant to Judge Castner's judicial preferences. <i>See</i> (ECF No. 239). On October 4, 2024, the Trustee filed a letter in response. <i>See</i> (ECF No. 248).
P&P SILVER FACTORY	Thailand	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
PARAG DIAMONDS INC., D/B/A PARAMOUNT	USA	On November 5, 2024, defendant filed an answer to the complaint and affirmative defenses. <i>See</i> (ECF No. 272). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
PAULA MARIANA PEREIRA DA SILVA	USA	The Clerk entered a default against defendant pursuant to F.R.C.P. 55(a) on December 17, 2024. <i>See</i> (ECF No. 320).

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		<i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
PLAYFUN GAMES CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). See (ECF No. 368).
QINGDAO QIXIANG INTERNATIONAL	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). See (ECF No. 368).
QINGDAO SHINING ROAD TYRE CO. LTD.	Hong Kong	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). See (ECF No. 368).
QUICK AUTOPROVIDERS, INC.	USA	On September 27, 2024, defendant filed a letter requesting a pre-motion conference concerning a Rule 12(b) motion to dismiss pursuant to Judge Castner's judicial preferences. See (ECF No. 235). On October 4, 2024, the Trustee filed a letter in response. See (ECF No. 246). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
RAINBOW SILVER CO. LTD.	Thailand	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). See (ECF No. 368).
RAYNARA G.S. AMORIM	Brazil	The Trustee's agents in Brazil are engaged in ongoing investigative efforts to locate this defendant to facilitate service of process by the Brazilian Central Authority.
REAG USA, LLC	USA	On August 6, 2024, defendant filed a letter requesting a pre-motion conference concerning a Rule 12(b) motion to dismiss pursuant to Judge Castner's judicial preferences. See (ECF No. 155). On August 13, 2024, the Trustee filed a letter in response. See (ECF No. 170). On April 8, 2025, in response to the Trustee's motion to refer certain defendants to the Bankruptcy Court, including Reag USA LLC, defendant filed a cross-motion to dismiss the complaint. See (ECF Nos. 380, 382). The Trustee filed an opposition to defendant's motion to dismiss on April 14, 2025. See (ECF No. 387).

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		<i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
RITEK CORPORATION	Taiwan	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). See (ECF No. 368).
RODRIGO MARTINS DE MELLO	Brazil	The Trustee's agents in Brazil are engaged in ongoing investigative efforts to locate this defendant to facilitate service of process by the Brazilian Central Authority.
SAMMINS TRADE LIMITED	China/Hong Kong	The Trustee's agent recently served this defendant pursuant to F.R.C.P. 4(f)(2)(A), and the Trustee will file an affidavit of service to that effect with the Court. <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
SCHUTZ ASSESSORIA EMPRESARIAL LTDA.	Brazil	This defendant filed a Rule 12(b) motion to dismiss on December 2, 2024. See (ECF No. 301). On December 3, 2024, the Court construed defendant's motion to dismiss as a request for a pre-motion conference pursuant to Judge Castner's judicial preferences and directed the Trustee to file a letter in response. See (ECF No. 302). On December 10, 2024, the Trustee filed a letter response. See (ECF No. 308). <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
SHANGHAI NAR INDUSTRIAL CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). See (ECF No. 368).
SHAOXING KEQIAO	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). See (ECF No. 368).

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SHASNXI DURS SAFETY MATERIALS CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
SILVER LAND	Thailand	The Trustee's agent unsuccessfully attempted service on defendant pursuant to F.R.C.P. 4(f)(2)(A) and has been otherwise unable to effectuate service. <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
SPK INTERNATIONAL IN LIMITED	Hong Kong	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
STAR SILVER BY PRINCESS	Thailand	The Trustee's agent has attempted service on defendant pursuant to F.R.C.P. 4(f)(2)(A) and is awaiting confirmation as to whether the service was successful. <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
TAIZHOU KELE HSE INDUSTRY CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
TIANJIN CUTPRINT CNC TECHNOLOGY	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
TOP SILVER	Thailand	The Trustee's agent has attempted service on defendant pursuant to F.R.C.P. 4(f)(2)(A) and is awaiting confirmation as to whether the service was successful. <i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i>
TREVISIO CORRETORA DE CAMBIO S.A.	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
TW BRASIL LTDA. F/K/A TW DISTRIBUIDORA DE BEBIDA LTDA.	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to

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		the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority without objection, and counsel is waiting for the Brazilian courts to issue the document to confirm completion of service.
UNITECH USA-SCIENTIFIC SOLUTIONS, CORP.	USA	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 262).
UNVIR CO. LIMITED	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
UP AND EIGHT CORP.	USA	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 334).
VINICIUS OLIVEIRA MENDES	Brazil	The Trustee's agents in Brazil are engaged in ongoing investigative efforts to locate this defendant to facilitate service of process by the Brazilian Central Authority.
WALTER CORDEIRO FILHO	Brazil	The Trustee's Brazilian counsel sent a formal service request for this defendant to Brazil's Central Authority on June 21, 2024. <i>See</i> (ECF No. 218). According to the Trustee's Brazilian counsel, defendant has received a copy of the letter rogatory from the Central Authority, and counsel is waiting for the Brazilian courts to issue the document to confirm completion of service.
WALTER CORDEIRO NETTO	Brazil	The Trustee's agents in Brazil are engaged in ongoing investigative efforts to locate this defendant to facilitate service of process by the Brazilian Central Authority.
WAVE TECH CO.	USA	<p>The Florida Secretary of State accepted substitute service of process for defendant on May 29, 2024. <i>See</i> (ECF Nos. 124 and 125). Defendant did not file an answer to the complaint by the deadline of June 20, 2024.</p> <p><i>*This defendant is included in the Trustee's motion to refer certain defendants to the Bankruptcy Court. See (ECF No. 365).</i></p>

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WEB7 DIGITAL	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
WENLING JIAFENG MACHINERY CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
WENZHOU FATO MECHANICAL ELECTRICAL	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
WENZHOUZHONGLONG TRADING CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
WHESLEY SOUZA SENA	Brazil	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
XIAMEN CAREFUL IMP. AND EXP. CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
XIAMEN HONGJING INUSTRY & TRADE	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
XIAMEN SUNROY IMPORT AND EXPORT	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
YIWU ACORN IMPORT AND EXPORT CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
YIWU LOTUS IMP. AND EXP. CO. LIMITED	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
YIWU NAJIA IMPORT AND EXPORT CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
YIWU PARADISE IMP. AND EXP. CO., LIMITED	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
YIWU PRIMULA IMPORT AND EXPORT CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
YIWU SUN FLOWER IMP. AND EXP. CO.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
YIWU SUNTING INTERNATIONAL TRADE CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).

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YIWU XIAWEI IMPORT AND EXPORT CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
YIWU ZONGHENG IMPORT AND EXPORT CO.	Hong Kong	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
YUYAO FOREVER STAR SPRAYER	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
ZHANGZHOU DONGRONG MOTOR TECHNOLOGY	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
ZHEJIANG LIYA VEHICLE CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
ZHEJIANG ZHONGYU INDUSTRY	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
ZHUJI WEIWEI IMPORT & EXPORT CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).
ZHUZHOU OBT CARBIDE TOOLS CO. LTD.	China	Voluntarily dismissed pursuant to F.R.C.P. 41(a)(1)(A)(i). <i>See</i> (ECF No. 368).

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We thank the Court for its attention to this matter and will provide any further information needed to address the questions and issues identified in the Text Order.

Respectfully submitted,



Eric T. Kanefsky
Calcagni & Kanefsky LLP

cc (via ECF): all counsel of record

EXHIBIT A

DECLARATION OF MONIQUE P. LEVY

Pursuant to 28 U.S.C. § 1746, I, Monique P. Levy, under penalty of perjury, declare as follows:

1. My name is Monique P. Levy. I am over the age of eighteen and am competent to make this declaration. The facts set forth herein are based upon my personal knowledge.

2. I understand that MLS Berkowitz Investments, LLC ("MLS") entered into a Purchase Contract with Gerald Metals Sarl on January 31, 2023.

3. Shortly thereafter, in February 2023, my brother, Diego Possebon, requested that I serve as the buyer's real estate agent in connection with the purchase of a pre-construction condominium unit (Unit 2601) at the Una Condominium, located at 175 SE 25th Road, Miami, Florida 33129 (the "Condominium"). Under the terms of the Purchase Agreement (the "Purchase Agreement"), a copy of which is attached hereto as Exhibit A, the buyer of the Condominium was Diego Possebon's wife, Larissa Carvalho Possebon. Ms. Possebon executed the Purchase Agreement on February 23, 2023, and the developer executed the Purchase Agreement on March 1, 2023.

4. The Purchase Price under the Purchase Agreement was \$5,875,000.00, and required the payment of several deposits totaling \$2,400,000.00.

5. Between September 7, 2022, and October 11, 2022, at the direction of Diego Possebon, I received the following wire transfers from MLS, totaling \$106,000.00 (the "2022 Transfers"):

- a. 9/7/2022: \$25,000.00
- b. 9/14/2022: \$10,000.00
- c. 9/29/2022: \$11,000.00

d. 10/11/2022: \$60,000.00

6. Between February 22, 2023, and March 16, 2023, at the direction of Diego Possebon, I received the following wire transfers from MLS, totaling \$1,029,322.30, which were to be used for the payment of deposits on the purchase of the Condominium (the “MLS Transfers”):

a. 2/22/2023: \$393,500.00

b. 2/28/2023: \$85,822.30

c. 3/8/2023: \$300,000.00

d. 3/13/2023: \$100,000.00

e. 3/16/2023: \$150,000.00

7. In addition, between March 27, 2023, and May 12, 2023, at the request of Diego Possebon, I received the following wire transfers from Empire Strong International Business Intermediation, LLC (“Empire Strong”), totaling \$1,119,841.24, which were also to be used for the payment of deposits on the purchase of the Condominium (the “Empire Strong Transfers”):

a. 3/27/2023: \$243,000.00

b. 4/11/2023: \$165,000.00

c. 4/12/2023: \$285,000.00

d. 4/19/2023: \$75,000.00

e. 5/4/2023: \$75,000.00

f. 5/11/2023: \$170,000.00

g. 5/12/2023: \$106,841.24

8. In total, I received a total of \$2,255,163.54 through the 2022 Transfers, the MLS Transfers, and the Empire Strong Transfers (the “Transferred Funds”).

9. Pursuant to instructions I received from Diego Possebon, I wired \$1,500,000.00 of the Transferred Funds to Fidelity National Title Insurance Company (“Fidelity”) as partial deposits on the purchase of the Condominium through the following wire transfers (the “Condo Deposits”):

- a. 2/24/2023: \$350,000.00
- b. 3/10/2023: \$350,000.00
- c. 4/13/2023: \$700,000.00
- d. 4/27/2023: \$100,000.00

10. After deducting the Condo Deposits from the Transferred Funds, there is a total of \$755,163.54 remaining (the “Remaining Funds”).

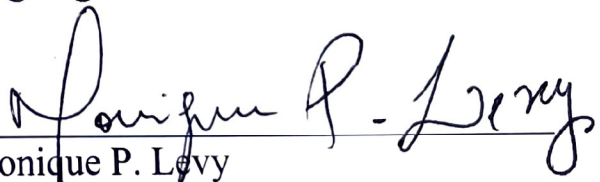
11. I am merely a custodian of the Remaining Funds and claim no individual interest in or right to the Remaining Funds.

12. From September 7, 2022, to the present, I have not received any funds from MLS or Empire Strong, on behalf of, or at the request or direction of Diego Possebon, other than the Transferred Funds.

13. I had no knowledge of any fraud allegations against Diego Possebon at the time I received the Transferred Funds.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 16, 2023.


Monique P. Levy